

Greetings to everyone here today to witness these proceedings, the USDA NOP staff, Members of the National Organic Standards Board and members of the press.

I am Jim Pierce, self appointed certification Czar for Organic Valley CROPP Cooperative in La Farge Wisconsin. This must be about the sixth time I have had the privilege of addressing the NOSB, the first time for this particular Board. I so much wanted to address you all in Austin for your maiden voyage as a new board but circumstances prevented it. In fact I had a Pentecostal Public Comment all prepared to be delivered by my good friend Kelly Shea but alas a series of I Love Lucyesque snafus derailed the project. Too bad, it was one of my finest caffeine induced diatribes to date urging you all to work together in solidaric brotherhood. I have copies...

One year ago in a deserted, paranoid version of this same city I stood before the NOSB and presented a list of over 200 livestock materials that needed clarification. I used the all too easy Train Wreck metaphor which must have had a profound effect because a year later the landscape has changed and that particular train may not wreck after all.

At the May meeting in Austin you passed a recommendation allowing most inerts and incidentals as well as materials on the processing list to be included in livestock feed. Good job well done! That took most of the questionable materials right off our list.

Right around that same time I got a call from Mark Keating (remember Mark Keating? Someday the Organic Pioneer Hall of Fame will include a tribute to Mark) anyway Mark was all excited because he had opened a beurocratic door just enough to stick his foot in it. That door allowed us to submit streamlined petitions for the materials that you are reviewing at this meeting. Great news except for a) Albeit I had lots of help it was up to me to write them and b) there were about two dozen so called "Fast Track" materials still on the list! A list that kept changing as we struggled with what was truly necessary for livestock AND suitable with organic production methods. We were loath to submit a petition that would paint the entire project in a bad light.

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In a very short time I learned a lot about materials I had little previous knowledge of. Things with insidious names like Flunixin and Butorphenol and Bismouth Subsylacitate. More profound than the new knowledge however was the wonderful professionals that helped me along the way. Doctors Karreman, Holiday, Engel, Dietloff and Snyder. Dan Leiterman and Kelly Shea among others kept the project on track and the information accurate.

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Then another serendipitous thing happened. As the TAPs started coming out and the committee began conferencing George Siemon, chair of the Livestock Committee and CEIEIO of the COOP where I Czar invited me to listen in, present information, do follow up research, take minutes and summarize the Committee's collective opinions. As a result while I cannot vouch for any of the other committees I'm here to tell you these folks did their homework coalescing reasonable collective decisions in a very short time. As a result of that experience I can look you in the eyes and assure you that those six people have thought long and hard about every motion that they are going to present.

None of these materials are being petitioned in order to shortcut production or cover for bad animal husbandry. Many of these materials being petitioned for organic livestock use and medicines that an organic mother would not hesitate to administer to her own child in an emergency. Some of these issues are not about the material itself as much as a larger sideline issue. The fate of the Organic Aloe Vera industry hangs on your decision regarding Potassium Sorbate and the question with Epinephrine is not one of manufacture but whether or not hormones have any place in organics.

Tomorrow marks the culmination of the single most interesting event in my career as Certification Czar. I'm going to be like the kid watching the Judges grade his 4-H steer at the fair. The one I watched being born, weaned, nurtured and helped grow into something to be proud of. At the same time I am Skepticaly fascinated to watch as you deal with 28 materials in two days. I have personally seen this board struggle for two days with Magnesium sulfate and have seen five boiler additives be deliberated for two years.

But alas I'm taking up valuable material review time so let me end with my standard caveat to you all: While I have great respect and admiration for the dedication and sacrifice that each of you has given to this worthy endeavor I do not envy your job in dealing with these difficult issues. To each of you I say Good Luck, God Bless You and Thank You.